

# **EXHIBIT B**

**Quigley, Kevin C.**

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**From:** Dimitry Joffe <dimitry@joffe.law>  
**Sent:** Saturday, April 18, 2020 5:02 PM  
**To:** Quigley, Kevin C.  
**Cc:** Saso, Paul A.; josh@joshmcguirelaw.com; Callaghan, Anthony; Bunis, Michael; Edgarton, G. Mark.  
**Subject:** RE: Filing  
**Attachments:** SOF (Apr. 18) - Copy.docx

**\*\*External Email\*\***

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Kevin -- here is the SOF in Word with Plaintiffs' responses to Defendants' statements followed by Plaintiffs' statements in consecutively numbered paragraphs.

Regards,  
Dimitry

This email is secured.

----- Original Message -----

On Friday, April 17, 2020 4:52 PM, Quigley, Kevin C. <kquigley@choate.com> wrote:

Dimitry,

We've conferred with our client, who would prefer to preserve the confidentiality of the exhibits you attached. Defendants do not object to your motion to seal.

Thanks,

Kevin

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**From:** Saso, Paul A. <PSaso@gibbonslaw.com>  
**Sent:** Friday, April 17, 2020 1:29 PM  
**To:** Dimitry Joffe <dimitry@joffe.law>  
**Cc:** josh@joshmcguirelaw.com; Callaghan, Anthony <ACallaghan@gibbonslaw.com>; Quigley, Kevin C. <kquigley@choate.com>; Bunis, Michael <mbunis@choate.com>; Edgarton, G. Mark. <gedgarton@choate.com>  
**Subject:** RE: Filing

**\*\*External Email\*\***

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Dimitry,

Defendants are considering your request. Expect that our colleagues at Choate will return to you on this, as they are taking the lead on the motion for summary judgment.

Regards,

Paul

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Paul A. Saso, Esq. / Director

Gibbons P.C., One Pennsylvania Plaza, 37th Floor, New York, New York 10119  
Tel: 212-613-2171 / Fax: 212-554-9686 / [psaso@gibbonslaw.com](mailto:psaso@gibbonslaw.com)

**From:** Dimitry Joffe <[dimitry@joffe.law](mailto:dimitry@joffe.law)>  
**Sent:** Thursday, April 16, 2020 11:46 PM  
**To:** Saso, Paul A. <[PSaso@gibbonslaw.com](mailto:PSaso@gibbonslaw.com)>  
**Cc:** [josh@joshmcguirelaw.com](mailto:josh@joshmcguirelaw.com); Callaghan, Anthony <[ACallaghan@gibbonslaw.com](mailto:ACallaghan@gibbonslaw.com)>;  
[kquigley@choate.com](mailto:kquigley@choate.com); [mbunis@choate.com](mailto:mbunis@choate.com); [gedgarton@choate.com](mailto:gedgarton@choate.com)  
**Subject:** Filing

Paul -- apologies for missing the 6 pm deadline today, I am in the process of filing Daubert brief, and I want to ask for your consent to the sealing motion for a few exhibits unless you'll agree to waive confidentiality on those exhibits and save everybody some trouble.. I attach those currently sealed exhibits, see if they are worth it..I'll have to serve the SOF tomorrow though, hope it would not inconvenience you too much..

This email is secured.



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